

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

BW  
USDC - GREENBELT  
'23 JAN 19 PM 4:01

Elsie M. Hunt - Nasario

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Greenbelt Police Dept.

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**Complaint for a Civil Case**

Case No.

**TDC 23 CV 0143**

*(to be filled in by the Clerk's Office)*

Jury Trial: ☐ Yes ☐ No  
*(check one)*

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Elsie M. Hunt-Nasario</u>
Street Address	<u>9014 Rhode Island Ave., # 706</u>
City and County	<u>College Park, Prince Georges</u>
State and Zip Code	<u>Maryland, 20740</u>
Telephone Number	<u>240-416-0898</u>
E-mail Address	<u>huntnasario@yahoo.com</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Greenbelt Police Department</u>
Job or Title (if known)	<u>Richard Bowers</u> <u>Chief of Police</u>
Street Address	<u>550 Crescent Road</u>
City and County	<u>Greenbelt, Prince Georges</u>
State and Zip Code	<u>Maryland. 20770</u>
Telephone Number	<u>301-474-7200</u>
E-mail Address (if known)	<u>greenbelt.pd@greenbelt.md.gov</u>

Defendant No. 2

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

Beltway Plaza Mall Security  
David, Manager

6000 Greenbelt Rd

Greenbelt, MD 20770

301-345-1500

Defendant No. 3

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

Defendant No. 4

Name

Job or Title  
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address  
(if known)

*(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Jurisdiction of Maryland

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Elsie M. Hunt-Nasario, is a citizen of the State of (name) Maryland.

**b. If the plaintiff is a corporation**

The plaintiff, (name) Greenbelt PD, is incorporated under the laws of the State of (name) Maryland, and has its principal place of business in the State of (name) Maryland.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Greenbelt Police Dept, is a citizen of the State of (name) Maryland. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) Greenbelt Police PD, is incorporated under the laws of the State of (name) Maryland, and has its principal place of business in the State of (name) Maryland. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\$75,000 is the amount in controversy



### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Greenbelt Police Officers made false claims against me. I was not intoxicated when this happened. I went into Giant. I do not know what went on. I thought I walked into something. I was unconscious, how long I don't know. When I saw the police officers when I came to, one of them asked me did I want an ambulance and I said no. They talked among themselves and left. Did not say anything to me. I checked my purse and my whole set of keys were missing. I left Giant + checked on my car and it was where I parked it. The next day it was at Giant. They did not take me home, I had to walk home. Came back the next day + my car was moved. I located it in Giant Parking Lot. It was further down not too far from the mall security office.

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

*They made false claims against me. I cannot  
see why they are doing this to me. Can't sleep  
like I should. Not feeling good at all.*

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Jan 19, 2023

Signature of Plaintiff Elsie M. Hunt-Nasario  
 Printed Name of Plaintiff ELSIE M. HUNT-NASARIO

*(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)*

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney \_\_\_\_\_  
 Printed Name of Attorney \_\_\_\_\_  
 Bar Number \_\_\_\_\_  
 Name of Law Firm \_\_\_\_\_  
 Address \_\_\_\_\_  
 Telephone Number \_\_\_\_\_  
 Email Address \_\_\_\_\_